

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13553 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	

**AFFIDAVIT AND DISCLOSURE STATEMENT OF BRADLEY C. TANK,
ON BEHALF OF NEUBERGER BERMAN FIXED INCOME LLC**

STATE OF ILLINOIS)
) ss:
COUNTY OF COOK)

Bradley C. Tank, being duly sworn, upon his oath, deposes and says:

1. I am a Chief Executive Officer, Director and a Managing Director of Neuberger Berman Fixed Income LLC, with principal offices located at 190 South LaSalle Street, Suite 2400, Chicago, Illinois 60603 (the "Firm").
2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors") and, collectively with their non-debtor affiliates, "Lehman"), have requested that the Firm provide investment advisory services to the Debtors, and the Firm has consented to provide such services.
3. I submit this Affidavit in accordance with the procedures set forth in the order entered November 5, 2008 authorizing the Debtors to employ professionals utilized in the ordinary course of business [Docket No. 1394] in connection with the Firm's engagement with

the Debtors, pursuant to sections 105(a), 327(a), 328, 330 and 504 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*

4. Pursuant to the order, dated December 22, 2009 [Docket no. 2350], authorizing and approving the sale of the Debtors' assets owned, held or used primarily in connection with Lehman's investment management business (the "Sale"), LBHI owns 49% of the common stock and 97% of the preferred stock of Neuberger Berman Group LLC ("Neuberger"), the indirect parent of the Firm.

5. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is engaged to provide investment management services to different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates other than those listed in paragraph 7.

6. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm and Neuberger Berman Europe Limited ("NB Europe"), an affiliate of the Firm. The Firm may delegate certain investment advisory services to be provided to the Debtors to NB Europe.

7. Due to the ownership and integrated operation of the operating companies of Neuberger by and with LBHI prior to the Sale, I and certain employees of the Firm may have

claims against or equity interests in LBHI, including, without limitation, claims for wages, compensation, and retirement benefits. Other than as set forth in the preceding sentence, neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates.

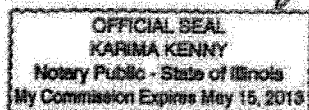
8. The Debtors owe the Firm \$0 for prepetition services.

9. At any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

By: 
Bradley C. Tank

Subscribed and sworn to before me
this 7th day of January, 2010


Notary Public



**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

RETENTION QUESTIONNAIRE

**TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN
BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively,
the "Debtors")**

**DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.
RETURN IT FOR FILING BY THE DEBTORS, TO:**

**Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, New York 10153
Attn: Jennifer Sapp
Christopher Stauble**

**All questions must be answered. Please use "none," "not applicable," or "N/A," as
appropriate. If more space is needed, please complete on a separate page and attach.**

- 1. Name and address of firm:**

Neuberger Berman Fixed Income LLC

190 South LaSalle Street, Suite 2400

Chicago, IL 60603

- 2. Date of retention: December 10, 2009**

3. **Type of services provided (accounting, legal, etc.):**

Investment advisory

4. **Brief description of services to be provided:**

The Investment Management Agreement between the Firm and LBHI has
the stated objectives of (i) an orderly liquidation of the securities in the
portfolio in line with achieving maximum value for LBHI and (ii)
distribution of principal and interest proceeds from such securities to
LBHI on a regular basis. The services will include hedging the non-US
currency portfolio to mitigate FX risk. The firm will also make short-term
investments of cash posted in connection with such hedging transactions
consistent with the authority granted to the Debtors pursuant to the order
authorizing Debtors to (a) maintain, close and open
new bank accounts located at unauthorized depositories and accounts
located at United States Trustee authorized depositories, (b) implement
investment guidelines, and (c) to the extent necessary, a waiver of
Section 345(b) of the Bankruptcy Code [Docket No. 3048].

5. **Arrangements for compensation (hourly, contingent, etc.)**

0.20% per annum of the value of the assets in the portfolio

(a) **Average hourly rate (if applicable):**

(b) **Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition):**

\$32,000 per month

6. **Prepetition claims against the Debtors held by the firm:**

Amount of claim: \$0

Date claim arose: _____

Source of Claim: _____

7. **Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:**

Name: _____

Status: _____

Amount of Claim: \$ _____

Date claim arose: _____

Source of claim: Due to the ownership and integrated operation of the operating companies of Neuberger by and with LBHI prior to the Sale, I and certain employees of the Firm may have claims against or equity interests in LBHI, including, without limitation, claims for wages, compensation, and retirement benefits.

8. **Stock of the Debtors currently held by the firm:**

Kind of shares: none

No. of shares: _____

9. **Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:**

Name: _____

Status: Due to the ownership and integrated operation of the operating
companies of Neuberger by and with LBHI prior to the Sale, I and certain
employees of the Firm may have claims against or equity interests in LBHI,
including, without limitation, claims for wages, compensation, and
retirement benefits.

Kind of shares: _____

No. of shares: _____

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

Other than as set forth in responses to Questions 7 and 9 above, none.

11. Name of individual completing this form:

Bradley C. Tank